Case 09-32057 Document 128 Filed in TXSB on 03/25/10 Page 1 of 3

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE:	§
LAWRENCE J. WEDEKIND,	§ CHAPTER 11
DEBTOR.	§ Case No. 09-32057-H4-11
	§ §

DEBTOR'S ADVISORY TO THE COURT REGARDING DEPOSIT MADE WITH FORMER COUNSEL

TO THE HONORABLE JEFF BOHM, UNITED STATES BANKRUPTCY JUDGE:

LAWRENCE J. WEDEKIND, Debtor herein, respectfully responds to the Court's Order Requiring Debtor to Produce a Copy of the Check Given to Retain Former Counsel.

- 1. Larry J. Wedekind ("LW") sold stock he owned in Integranet Physician Resources, Inc. in a cash transaction that closed on November 12, 2008. This transaction and the disposition of the \$450,000 proceeds of the sale of the Integranet stock owned by Larry Wedekind were detailed in Debtor's Third Amended Disclosure Statement ("DS") approved by order of this Court on March 1, 2010, Document No. 115, at pages 33-36.
- 2. In the DS, at page 34, LW indicates the following transaction on November 19, 2008:
 - "LW issues check on IPRI GB Account¹ for \$40,000 to cash, which was placed into LW's safe at the house, and then used to fund retainer for Aaron Keiter (\$30,000) and Mike Jayson (\$10,000) in March 2009."
- 3. After considering the matter further, LW believes that the \$30,000 paid to Aaron Keiter was for the benefit of Clark & Keiter, P.C., and was paid in three installments, as follows:

¹ The IPRI GB Account is an account opened on November 13, 2008, at Greens Bank in the name of IntegraNet Physician Resources, Inc. ("IPRI") on November 13, 2008.

Case 09-32057 Document 128 Filed in TXSB on 03/25/10 Page 2 of 3

(a) \$8,000.00 paid shortly after the closing of the sale of stock on November 12, 2008, (b) \$14,000.00 paid in mid-February 2009, and (c) \$8,000 paid a week before the bankruptcy filing on March 31, 2009.

4. The reason LW retained this \$40,000 in cash in his safe at home was due to the fact that the IRS had indicated that LW's past due account was in collection. LW was concerned that the IRS would attach or garnish his personal bank accounts in a collection effort to satisfy the IRS claim.

Respectfully submitted this 24th day of March 2010.

/s/ Leonard H. Simon
Leonard H. Simon, Esq.
TBN: 18387400; SDOT: 8200
The Riviana Building
2777 Allen Parkway, Suite 800
Houston, Texas 77019
(713) 737-8207 (Direct)
(832) 202-2810 (Direct Fax)
lsimon@pendergraftsimon.com
COUNSEL FOR DEBTOR

OF COUNSEL:

PENDERGRAFT & SIMON The Riviana Building 2777 Allen Parkway, Suite 800 Houston, Texas 77019 (713) 528-8555 (Main) (713) 868-1267 (Main Fax) MAR. 25. 2010 11:02AM IntegraNet NO. 1726 P. 4

Case 09-32057 Document 128 Filed in TXSB on 03/25/10 Page 3 of 3

DECLARATION OF LAWRENCE J. WEDEKIND

My name is Lawrence J. Wedekind. I am over the age of 18, and I am fully competent to make this unsworn declaration. I have reviewed the facts stated in this Advisory, and I hereby declare under penalty of perjury that I have personal knowledge of such facts, and that, to the best of my independent recollection, buttressed by my investigation into my bank records and the bank records of Integranet Physician Resources, Inc., and after having discussions with Aaron Keiter and Mike Jayson, such facts are true and correct.

Lawrence J. Wedekind

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing has been served by electronic transmission to all registered ECF users appearing in the case on this 24th day of March 2010.

/s/ Leonard H. Simon Leonard H. Simon